EXPANDE UNIDATE FILED

December 18, 1997

Magalie Roman Salas Secretary

Federal Communications Commission 1919 M Street, N.W.

Room 222

Washington, D.C. 20554



Re:

CC Docket Nos. 97-231, 97-208, 97-146, 96-262, 96-128, 96-98, 96-61, 96-45, 94-129, 94-54 and File No. WTB/POL 97-1

Dear Ms. Salas:

Today the undersigned, accompanied by Ernest B. Kelly, III, President, and David Gusky, Vice President, respectively, of the Telecommunications Resellers Association, met with Commissioner Powell, Paul A. Jackson, Special Assistant to the Commissioner, and Kyle Dixon, Legal Advisor to the Commissioner. Discussed at those meetings were TRA's positions in the above-referenced dockets as per the attachment.

Respectfully submitted,

Charles C. Hunter

Attachment

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ISSUES OF KEY CONCERN

• BOC Entry Into the "In-region," interLATA Market

- Ensure that Local Markets are Fully and Irreversibly Open to Competition
- Consider Pricing of Unbundled Network Elements and Wholesale Services and Availability of Existing Combinations of Unbundled Network Elements
- Require Strict 14-Point "Competitive Checklist" Compliance
- Avoid Relaxation of "Track A"/"Track B" Thresholds

Access Charge Reform

- Reduce Multi-line Business Preferred Interexchange Carrier Charge
- Reinstate "Unitary" Option for Purchasing Tandem-Switched Transport
- Eliminate Increase in Tandem Switching Charge
- Drive Interstate Switched Access Charges to the Forward-Looking Economic Cost of Call Origination/Termination

• Entry Into Local Telecommunications Markets

- Eliminate Restrictions on Resale of Contract Service Arrangements, Voice Messaging and Other Competitively Essential Services
- Mandate Commercially Viable Operations Support Systems
- Impose Meaningful Performance Standards on Incumbent LECs

• Resale of Wireless Services

- Eliminate "Sunsetting" of Wireless Resale Requirements
- Require Switch-to-Switch Interconnection
- Mandate Compliance by PCS Licensees with Resale Requirements
- Prohibit Exclusive Dealing Arrangements

Universal Service Support Mechanisms

- Reclassify Universal Service Contributions as Mandatory End-User Surcharges
- Retain Eligibility of Non-Facilities-Based Carriers for Universal Service Support

Mandatory Detariffing

- Substitute "Permissive Detariffing" for "Mandatory Detariffing"
- Require Public Availability of All Rates and Service Terms and Conditions

• "Per-Call" Payphone Compensation

- Decouple Non-Coin Payphone Compensation from the Local Coin Rate
- Base "Per-Call" Compensation of the Forward-Looking Economic Cost of Completing Payphone-Originated Calls

• Unauthorized Carrier Changes

- Adopt Rational Safeguards Against "Slamming"
- Avoid Requirements that Invite Consumer Fraud
- Implement Safeguards to Protect Against Abuses of the Carrier Change and "PIC-Freeze Process

• International Call-Back Service

• Prevent Use of FCC Complaint Processes by Foreign Carriers to Insulate Their Home Markets

• Voice Telephony Over the Internet

• Eliminate the Exemption Afforded Enhanced Service Providers from Interstate Switched Access Charges